



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

J. O. Klinkenberg, Treasurer
Northwest Airlines Political
Action Committee
5101 Northwest Dr.
St. Paul, MN 55111

JAN 12 2000

Identification Number: C00104802

Reference: Mid-Year Report (1/1/99 through 6/30/99)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses a contribution(s) to the Latham for Congress Committee, Brian Baird for Congress, Friends of Jim Oberstar and Hutchinson for Congress for the retirement of debts incurred by the 1998 primary election campaign; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should either notify the recipient and request a refund of the impermissible amount and/or notify the recipient, in writing, of your redesignation of the contribution. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation

is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Gelind H. Grable
Reports Analyst
Reports Analysis Division

